

IN THE SUPERIOR COURT OF LOWNDES COUNTY

STATE OF GEORGIA

LOWNDES COUNTY, GEORGIA
FILED IN OFFICE

2010 MAY 24 PM 3: 57

DEBORAH CLARK,

Plaintiff

v.

LETICA CORPORATION ,

Defendant.

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CIVIL ACTION

FILE NO.

2010 CV 1421

Lena L. Crow
CLERK SUPERIOR STATE
JUVENILE COURT

COMPLAINT

COMES NOW, Deborah Clark, and files this Complaint against the Letica Corporation and shows the Court as follows:

1.

Plaintiff is a resident of the state of Georgia.

2.

Defendant is a foreign for profit corporation, which is authorized to and does transact business within the State of Georgia and transacts business and has a plant in Lowndes County Georgia.

3.

This action is brought pursuant to the Equal Pay Act (28 U.S.C.A. § 206(d) (1).)

4.

This Honorable Court has concurrent jurisdiction with the Federal Courts to hear this matter.

5.

Jurisdiction and venue are proper in this Court.

6.

On April 17, 2000, Plaintiff was hired by the Defendant as an Assistant Plant Manager.

7.

On or about July 1, 2004, Plaintiff was promoted to Plant Manager. There are approximately 12 plant managers that work for the Defendant throughout the United States. During Plaintiff's employment, Plaintiff was the only female plant manager.

8.

During Plaintiff's employment, the Valdosta, Georgia plant where Plaintiff was the manager was routinely one of the highest rated and most profitable plants owned and operated by the Defendant.

9.

Despite of the success of Plaintiff as a plant manager, Plaintiff's base salary was the lowest of all the plant managers and Plaintiff was the only female plant manager.

10.

By setting the Plaintiff's base salary as the lowest of all plant managers for the Defendant because Plaintiff was female, the Defendant violated the Equal Pay Act.

11.

The Defendant violated the Equal Pay Act in determining Plaintiff's base salary.

12.

Defendant willfully violated the Equal Pay Act.

13.

Plaintiff is entitled to punitive damages as a result of Defendant's intentional and willful acts in violation of the Equal Pay Act.


14.

Plaintiff is entitled to the amount of her unpaid minimum wages and an additional equal amount as liquated damages.

WHEREFORE, Plaintiff prays as follows:

- a. That process issue as provided by law;
- b. A trial by jury;
- c. Defendant shall be liable to the Plaintiff in the amount of her unpaid minimum wages and an additional equal amount as liquated damages;
- d. Plaintiff is entitled to attorney's fees pursuant to Federal Law;
- e. Plaintiff is entitled to punitive damages pursuant to Federal Law;
- f. That all issues raised in this Complaint be tried before a jury; and
- g. Such other and further relief as this Court may deem just and proper.

This the 2nd day of May, 2010.



Jody D. Peterman
Attorney for Plaintiff
Georgia Bar #573552

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